

TRACY NEFF,  
Plaintiff

vs.

LANDMARK EDUCATION  
CORPORATION AND DAVID GRILL,  
AN INDIVIDUAL,  
Defendants

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IN THE DISTRICT COURT

DALLAS COUNTY, TEXAS

162<sup>nd</sup> JUDICIAL DISTRICT

**AFFIDAVIT OF TRACY NEFF**

COMES NOW Tracy Neff, who deposed and stated as follows:

"My name is Tracy Neff. I am of sound mind, am over the age of eighteen (18), and have never been convicted of a felony or a crime of moral turpitude. The statements in this affidavit are made upon my personal knowledge and are true and correct.

"I met David Grill on the last day of my participation in the Landmark Forum, on or about December 18, 1994, at the Landmark Education Corporation Dallas Center, located near Bachman Lake in Dallas, Texas.

"After being introduced to Grill, I was told that he was the Center Manager, an employee of Landmark, and was a living example of the philosophies and teachings espoused and promoted by Landmark in the courses I attended. In particular, the Forum and related courses I took emphasized self-expression. I was told that David Grill's self expression was the best example of the teachings of Landmark.

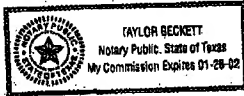
"After I completed my Forum, I began volunteering at the Dallas Center, where Grill was the supervisor. Many times I did tasks at his direction and interacted with him on numerous occasions relating to my volunteer work there. I also had conversations with him where he re-emphasized the Landmark viewpoints on self-expression, particularly in a sexual context. Grill told me that I should not feel guilt about expressing myself sexually. In particular, on January 2, 1995, Grill told me that self expression in accordance with the Landmark philosophy included freely expressing sexuality.

"On the evening of February 2, 1995, I encountered Grill while I was at the Center. He told me he needed to "share", which I recognized as a term used in the Landmark programs. Thereafter, I was manipulated by Grill to his apartment at 117 South Akard, where the sexual assault which is the subject of this law suit took place.

"Further Affiant Sayeth Not."

Tracy L. Neff  
Tracy Neff

SWORN TO AND SUBSCRIBED before me by \_\_\_\_\_  
on the 30<sup>th</sup> day of October, 1998.



Taylor Beckett  
NOTARY PUBLIC in and for the  
State of New York